

Before the  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

COMMENT TO RESPONSE OF THE UNITED STATES  
POSTAL SERVICE TO ORDER NO. 1366

Docket No. MC2012-26

The Mail Room

I am writing to formally comment on the proposed PO Box service changes under consideration. I am the owner of a small, private MPC that offers a variety of services, including most postal services and Private Mail Box rental (as a Commercial Mail Receiving Agent – CMRA). I am also a member of the USPS Approved Shippers Program. I have a serious concern about the potential negative impact these enhancements would have on my business. Furthermore, I believe that the USPS would gain an unwarranted and unjustified significant competitive advantage over private sector businesses like mine.

The enhanced PO Box services currently being offered that I oppose include:

- Offering Post Office Box renters the use of the Post Office street address for Post Office Box addressing.
- Removing the PO Box designation when using a street address.
- Offering Post Office Box renters email notification of mail delivery.
- Offering Post Office Box renters the ability to receive packages from private carriers.

These enhancements allow the USPS to offer an identical service to Private Mail Box (PMB) Service. When coupled with current CMRA regulations established by the USPS create a distinct and unfair advantage for the USPS in offering those services. The unfair regulatory advantages include, but are not limited to:

- The requirement to handle mail for 6 months for departed or cancelled customers. As a CMRA we are required to apply new postage to any item that is forwarded during this term whereas a PO Box customer receives free address forwarding services.
- The inability for PMB customers to file a change of address form once their contract has ended with the CMRA.

Additionally, the USPS has publicly expressed their desire to move from 6-day to 5-day delivery. The USPS has repeatedly stated that as their plan stands today, PO Box customers would continue to receive 6-day delivery while PMB customers and home delivery would not. Should the Post Office move to get approval of their desired 5-day delivery plan, they would gain yet another unfair advantage over PMB service. This action is engineered to unfairly increase the number of PO BOX customers by removing any competition to that Saturday delivery service.

While considering the addition of such PO Box services the PRC should also consider the additional cost that will be required in providing those services. I do not believe that the USPS has fully studied and planned for these cost.

Consider the following:

- Lost revenues since customers can now ship to PO Box Customers via other carriers.
- Increased cost of handling packages from alternate carriers; receiving, staging, delivering, and accountability.
- Increased need for package receiving and storage.
- Accountability for parcels that are mishandled at the Post Office?
- Procedures for unclaimed packages.
- Procedures and equipment for accountability of packages.

- Procedures for handling Hazardous materials such as Lithium batteries or firearms. Alternate carriers handle products that are restricted by the USPS.
- Increased wait time in line for all USPS customers.

At the 2011 National Postal Forum, Postmaster General Patrick R. Donahoe made reference to the vital role that MPCs (in the Approved Shippers Program) will have as the USPS tries to increase business and return to profitability. As more and more local USPS branches are closed and/or their hours restricted, MPCs will be needed to fill that void. The enhanced PO Box services currently being offered do not sit well with the above statement.

Reselling of USPS products and PMB services equate into 29.4% of my gross sales volume. This is a volume of sales that I can ill afford to lose. It is unreasonable to ask small businesses like myself to compete with the Post Office when that entity gives itself regulatory advantages on like services and products. When the Post Office first sought to move the PO Box service from the Market Dominant to Competitive category, no mention was made of adding any enhancements. These enhancements change the basic product, and when combined with the CMRA regulations, create a distinct and unfair competitive advantage for the USPS.

I respectfully request that the Commission advise the Post Office to cease offering these PO Box enhancements as soon as possible.

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Lebron Burton  
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Twin Falls, Idaho  
02 August, 2012